

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-30026-MAP
)	
CARLOS SALVATE,)	
Defendant.)	

THE GOVERNMENT'S MOTION FOR AN ORDER OF EXCLUDABLE DELAY
(Assented to)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §3161(h), from November 29, 2005, through March 10, 2006 for the following reasons:

1. On November 29, 2005, the Defendant stated his intentions to file motions to suppress physical evidence and statements. The time since that date should be excluded to allow the Defendant the necessary time to file his motions, and to allow the Government time to respond. See 18 U.S.C. § 18 U.S.C. §§ 3161(h)(1)(F).
2. Attorney Brown's competing caseload necessitated a continuance of the deadline by which the Defendant's motions were to be filed. Thus, the parties respectfully request the time to be excluded for reasons of continuity of counsel. See 18 U.S.C. §3161(h)(8)(B)(iv).

It is in the best interests of the Defendant, the Government, and the public, to exclude the time from November 29, 2005 through March 10, 2006, from the period within which the trial of this case must commence under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney

Dated: February 2, 2006